

From: [Kable Davis](#)
To: [Dan Peacock](#)
Subject: Re: Fw: Reckitt Benckiser
Date: 01/11/2010 12:13 PM

Thanks, Dan!

▼ [Dan Peacock---01/11/2010 12:10:48 PM---All, Below is the company's response \(4 attachments\) to our initial comments on their marketing clai](#)

From: Dan Peacock/DC/USEPA/US
To: Kable Davis/DC/USEPA/US@EPA, Jennifer Gaines/DC/USEPA/US@EPA, Bill Jacobs/DC/USEPA/US@EPA
Cc: Meredith Laws/DC/USEPA/US@EPA
Date: 01/11/2010 12:10 PM
Subject: Fw: Reckitt Benckiser

All,

Below is the company's response (4 attachments) to our initial comments on their marketing claims. Their response will be the subject of our internal meeting on Tuesday at 8AM.

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:
United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

----- Forwarded by Dan Peacock/DC/USEPA/US on 01/11/2010 12:06 PM -----

From: "Heather Bjornson" <HBJornson@TSGUSA.COM>
To: Dan Peacock/DC/USEPA/US@EPA
Cc: John Hebert/DC/USEPA/US@EPA
Date: 01/04/2010 02:36 PM
Subject: RE: Reckitt Benckiser

Dan -
I have attached two word files that add comments from me (identify what claims were approved previously and which RB should just take off), and the other table is Reckitt Benckiser's comments on the most important claims for them. I have also attached two recent registration notices with the stamp approved labels that have a good portion of these claims approved.

Regards,
Heather R. Bjornson
Technology Sciences Group, Inc.
1150 18th Street NW., Ste. 1000
Washington DC 20036
Tel.: 202-828-8945
Fax: 202-872-0745

-----Original Message-----
From: Peacock.Dan@epamail.epa.gov [mailto:Peacock.Dan@epamail.epa.gov]
Sent: Monday, January 04, 2010 2:20 PM
To: Heather Bjornson
Cc: Hebert.John@epamail.epa.gov
Subject: RE: Reckitt Benckiser

Dear Ms. Bjornson,

Before setting up a meeting, I would need to know the claims about which you have a problem. In addition, you have made certain representations about our accepting certain claims previously for such products. I need to know which claims you are referring to and the reg numbers and the dates of letters where we previously accepted those claims so that I can review them. As the pending products would be our first Tier III products registered, we will be very careful to insure that they are done correctly and that none of the proposed 400+ label claim combinations are false or misleading per 40 CFR 156(a)(5). After receiving the information above and having the relevant internal discussions, I would be happy to set up a conference call.

Thank You,

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:
United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

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| From: |
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| "Heather Bjornson"
<HBjornson@TSGUSA.COM>
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| To: |
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|----->
| Dan Peacock/DC/USEPA/US@EPA, John
Hebert/DC/USEPA/US@EPA
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|----->
| Date: |
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| 01/04/2010 11:16
AM
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| Subject: |
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| RE: Reckitt
Benckiser
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Can we please set-up a conference call with the two of you to discuss
the claims for the pending products? We will make ourselves available to
your schedule.

Regards,
Heather R. Bjornson
Technology Sciences Group, Inc.
1150 18th Street NW., Ste. 1000
Washington DC 20036
Tel.: 202-828-8945
Fax: 202-872-0745

-----Original Message-----
From: Peacock.Dan@epamail.epa.gov [mailto:Peacock.Dan@epamail.epa.gov]
Sent: Tuesday, December 29, 2009 10:56 PM
To: Heather Bjornson
Subject: Re: Reckitt Benckiser

Dear Ms. Bjornson,

Thank you for the electronic copies of the labels of the proposed 4
products: 3282-OA, 3282-OT, 3282-OI, and 3282-OO.

The attached 11 page table lists the 100+ marketing claims made for the
four products and includes the status of each claim for each product
(400+ combinations), including which claims:

are acceptable,
must be deleted, or
must be modified.

(See attached file: Status of Claims, -OA, -OT, -OI, -OO.doc)

I am working on the first letters for the two Bromethalin products
(3282-OA and 3282-OT), which will contain additional comments on the
forms, data, and labeling.
Those letters will most likely go out tomorrow or Monday.
I will be working on the letters for the two Diphacinone products as
soon as I receive the efficacy reviews.
With the above table and the letters for the Bromethalin products,
you will have a good sense of the remaining comments on the
Diphacinone products.

After you have had an opportunity to review the table and letters, let
me know if you have any questions.

Daniel B. Peacock, Biologist
Tel: 703-305-5407
Fax: 703-308-0029
E-Mail: peacock.dan@epa.gov

Addresses:
United States Postal Service (USPS): USEPA, Insecticide-Rodenticide
Branch, Registration Division (7504P), 1200 Pennsylvania Ave. NW,
Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration
Division, Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington,
VA 22202

|----->
| From: |
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"Heather Bjornson" <HBjornson@TSGUSA.COM>

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| To: |
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Dan Peacock/DC/USEPA/US@EPA

|----->
| Date: |
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12/16/2009 11:12 PM
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Subject:
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Reckitt Benckiser
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Dan -
I am traveling through Friday but you will find the requested labels
attached. Please e-mail me tomorrow if and what claims have to be
removed and I can get them done for you.

Regards,
Heather R. Bjornson
Technology Sciences Group, Inc.
1150 18th Street NW., Ste. 1000
Washington DC 20036
Tel.: 202-828-8945
Fax: 202-872-0745

[attachment "Saturn IV - diphacinone 10-16-09.doc" deleted by Dan
Peacock/DC/USEPA/US] [attachment "Mimas III - Bromethalin hrb.doc"
deleted by Dan Peacock/DC/USEPA/US] [attachment "Saturn III -
Bromethalin hrb.docx" deleted by Dan Peacock/DC/USEPA/US] [attachment
"Mimas IV - diphacinone (2).doc" deleted by Dan Peacock/DC/USEPA/US]

[attachment "Status of Claims -0A-OT-OI-00- hrb comments 12-31-09.doc" deleted by Kable Davis/DC/USEPA/US] [attachment
"Final Stamped Registration Notice 3282-93 9-23-09.pdf" deleted by Kable Davis/DC/USEPA/US] [attachment "Final Stamped
Registration Notice 3282-92 9-23-09.pdf" deleted by Kable Davis/DC/USEPA/US] [attachment "Status of Claims -0A-OT-OI-00-
RBmarketing comments.doc" deleted by Kable Davis/DC/USEPA/US]